

ORIGINAL

SEALED

FILED-USDC-NDTX-DA
24 JAN 17 PM 2:48

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

✓

UNITED STATES OF AMERICA

FILED UNDER SEAL

v.

NO. **3-24CR-019-L**

DHANESH DEORAJ GANESH (01)
a/k/a DAN

INDICTMENT

The Grand Jury charges:

General Allegations

At all times relevant to this indictment:

1. Defendant **Dhanesh Ganesh** controlled The Ganesh Group, a Texas company that leased commercial real estate to businesses in Dallas, Texas, including those located at 2030 Walnut Hill Lane, 9728 Abernathy Avenue, and 9734 Abernathy Avenue, in Dallas, Texas.
2. **Dhanesh Ganesh** controlled The Kalawathi Company. The Kalawathi Company operated Tequila Restaurant and Bar located at 2620 Walnut Hill Lane, Dallas, Texas.
3. **Dhanesh Ganesh** controlled Cassie Enterprises, Inc. Cassie Enterprises, Inc. owned a townhouse located at 4425 Lena Lane, Irving, Texas.
4. **Dhanesh Ganesh** controlled Andrea Enterprises, Inc. Andrea Enterprises, Inc. operated Restaurante El Emperador located at 10227 Harry Hones Boulevard, Dallas, Texas.

5. **Dhanesh Ganesh** controlled El Paraiso, a restaurant located at 3373 Lombardy Lane, Dallas, Texas.
6. **Dhanesh Ganesh** controlled El Reventon presents Jack Marks Lounge, a restaurant and bar located at 10865 Harry Hines Boulevard, Dallas, Texas.
7. **Dhanesh Ganesh** controlled Tacqueria Garibaldi, a restaurant and bar located at 3383 Lombardy Lane, Suite B, Dallas, Texas.
8. **Dhanesh Ganesh** controlled Las Hamacas, a restaurant and bar located at 10353 Denton Drive, Dallas, Texas.
9. **Dhanesh Ganesh** controlled RG Developments Co., a Texas company that sold used tires in Dallas, Texas.
10. **Dhanesh Ganesh** controlled Bartica Holdings Co., a Texas company that operated an Automated Teller Machine in Dallas, Texas.
11. **Dhanesh Ganesh** is the true owner of all of the above businesses but uses nominee names to conceal his ownership, including the names of his ex-wife, his brothers, and his sons.
12. **Dhanesh Ganesh**, along with other known and unknown, sold cocaine at some of the restaurants and bars.
13. **Dhanesh Ganesh** collected payments in the form of check and cash from these businesses.
14. Defendant **Dhanesh Ganesh** filed a federal income tax return in 1992. He has not filed a federal income tax return since then.

15. **Dhanesh Ganesh** did not have bank accounts in his personal name and did not have signatory authority on bank accounts opened in the names of the companies he controlled.

16. **Dhanesh Ganesh** cashed checks at check-cashing businesses. With that cash, **Dhanesh Ganesh** often purchased, and caused others to purchase, cashier's checks in amounts under \$3,000 and then gave the cashier's checks to his ex-wife to deposit into accounts on which she was a signatory.

17. **Dhanesh Ganesh** gave Individual A, a person known to the grand jury, large quantities of cash to deposit into accounts on which Individual A was a signatory.

18. Individual A was the sole signatory on checking accounts ending in 4558, 3245, 3471, and 5321 at Bank of America.

19. Individual A was the sole signatory on checking accounts ending in 7419, 1582, 5393, 2989, 7527, 2693, and 2121 at J.P. Morgan Chase, N.A.

20. Both Individual A and **Dhanesh Ganesh** are signatories on the checking account ending in 7419 at J.P. Morgan Chase, N.A., opened in the name Demerara, Individual A's clothing and accessory store.

21. J.P. Morgan Chase Bank, N.A. was a domestic financial institution within the meaning of 31 U.S.C. §§ 5312 and 5313(a).

22. Bank of America was a domestic financial institution within the meaning of 31 U.S.C. §§ 5312 and 5313(a).

23. The allegations contained in Paragraphs 1 through 22 are incorporated in each and every Count of this Indictment.

Count One
Tax Evasion
(Violation of 26 U.S.C. § 7201)

24. During the calendar year 2017, defendant **Dhanesh Ganesh**, a resident of Ft. Worth, Texas, received taxable income, upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make income tax returns on or before April 17, 2018, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, **Dhanesh Ganesh**, from on or about January 2017, through on or about April 2018, in the Northern District of Texas, Dallas Division, and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar years 2017, by committing the following affirmative acts, among others:

- a. Concealing his true ownership and control of businesses by placing them in the names of nominees;
- b. Concealing his true ownership of real properties by placing them in names of nominees;
- c. Using nominees to conduct business;
- d. Dealing extensively in cash; and
- e. Using at least one bank account opened in the name of a family member.

All in violation of 26 U.S.C. § 7201.

Count Two
Tax Evasion
(Violation of 26 U.S.C. § 7201)

25. During the calendar years 2018, defendant **Dhanesh Ganesh**, a resident of Ft. Worth, Texas, received taxable income, upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make income tax returns on or before April 15, 2019, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, **Dhanesh Ganesh**, from on or about January 1, 2018, through on or about April 15, 2019, in the Northern District of Texas, Dallas Division, and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar year 2018, by committing the following affirmative acts, among others:

- a. Concealing his true ownership and control of businesses by placing them in the names of nominees;
- b. Concealing his true ownership of real properties by placing them in names of nominees;
- c. Using nominees to conduct business;
- d. Dealing extensively in cash;
- e. Using at least one bank account opened in the name of a family member.

All in violation of 26 U.S.C. § 7201.

Count Three
Tax Evasion
(Violation of 26 U.S.C. § 7201)

26. During the calendar years 2019, defendant **Dhanesh Ganesh**, a resident of Ft. Worth, Texas, received taxable income, upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make income tax returns on or before July 15, 2020, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, **Dhanesh Ganesh**, from on or about January 1, 2019, through on or about July 15, 2020, in the Northern District of Texas, Dallas Division, and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar year 2019, by committing the following affirmative acts, among others:

- a. Concealing his true ownership and control of businesses by placing them in the names of nominees;
- b. Concealing his true ownership of real properties by placing them in names of nominees;
- c. Using nominees to conduct business;
- d. Dealing extensively in cash; and
- e. Using at least one bank account opened in the name of a family member.

All in violation of 26 U.S.C. § 7201.

Count Four
Tax Evasion
(Violation of 26 U.S.C. § 7201)

27. During the calendar years 2020, defendant **Dhanesh Ganesh**, a resident of Ft. Worth, Texas, received taxable income, upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make income tax returns on or before May 17, 2021, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, **Dhanesh Ganesh**, from on or about January 1, 2020, through on or about May 17, 2021, in the Northern District of Texas, Dallas Division, and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar year 2020, by committing the following affirmative acts, among others:

- a. Concealing his true ownership and control of businesses by placing them in the names of nominees;
- b. Concealing his true ownership of real properties by placing them in names of nominees;
- c. Dealing extensively in cash; and
- d. Using at least one bank account opened in the name of a family member.

All in violation of 26 U.S.C. § 7201.

Count Five
Tax Evasion
(Violation of 26 U.S.C. § 7201)

28. During the calendar years 2021, defendant **Dhanesh Ganesh**, a resident of Ft. Worth, Texas, received taxable income, upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make income tax returns on or before April 18, 2022, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, **Dhanesh Ganesh**, from on or about January 1, 2021, through on or about April 18, 2022, in the Northern District of Texas, Dallas Division, and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar year 2021, by committing the following affirmative acts, among others:

- a. Concealing his true ownership and control of businesses by placing them in the names of nominees;
- b. Concealing his true ownership of real properties by placing them in names of nominees;
- c. Using nominees to conduct business;
- d. Dealing extensively in cash;
- e. Using at least one bank account opened in name of a family members; and
- f. Lying to law enforcement by stating that he never gave cash to his daughter Cassie Ganesh and that if he did ever give her money, it was never more than \$10,000.

All in violation of 26 U.S.C. § 7201.

Count Six

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(C))

29. Beginning in or about February 17, 2019, and continuing until on or about April 29, 2022, the exact dates being unknown, in the Dallas Division of the Northern District of Texas and elsewhere, **Dhanesh Ganesh**, defendant, did knowingly, intentionally, and unlawfully combine, conspire, confederate and agree with other persons both known and unknown to commit certain offenses against the United States, namely, to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

All in violation of 21 U.S.C. § 846.

Count Seven
Conspiracy to Launder Monetary Instruments
(Violation of 18 U.S.C. § 1956(h))

30. Beginning at least as early as February 17, 2019, and continuing to the present, the exact dates being unknown to the Grand Jury, in the Northern District of Texas, and elsewhere, the defendant, **Dhanesh Ganesh**, did knowingly combine, conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to commit the following offenses against the United States in violation of 18 U.S.C. § 1956(h), namely:

- a. to knowingly conduct, and attempt to conduct, a financial transaction involving the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction or attempted financial transaction represented the proceeds of some form of specified unlawful activity, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, in violation of 21 U.S.C. § 846 and 841(a)(1), and knowing that the transaction was designed, in whole or in part, to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and
- b. to knowingly engage, or attempt to engage, in a monetary transaction involving the proceeds of a specified unlawful activity, namely, conspiracy to possess with intent to distribute and to distribute a controlled substance, in violation of 21 U.S.C. § 846 and 841(a)(1), in an amount greater than

\$10,000, by, through, or to a financial institution and that while engaging and attempting to engage in such monetary transaction, knew that the property involved in the transaction was criminally derived, in violation of 18 U.S.C. § 1957.

All in violation of 18 U.S.C. § 1956(h).

Forfeiture Notice
(21 U.S.C. § 853(a) and 18 U.S.C. § 982(a)(1))

31. Pursuant to 21 U.S.C. § 853(a), upon conviction for a violation of 21 U.S.C. § 846, **Dhanesh Ganesh**, defendant, shall forfeit to the United States any property constituting or derived from proceeds obtained, directly or indirectly, as a result of the respective offense and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the respective offense, and/or pursuant to 18 U.S.C. § 982(a)(1) upon conviction for a violation of 18 U.S.C. § 1956(h), **Dhanesh Ganesh**, defendant, shall forfeit to the United States any property involved in the respective offense, and any property traceable to the offense, including, but not limited to, the following:

- a. \$638 in U.S. currency seized on April 29, 2022;
- b. A Smith and Wesson Model 640-3, .357 magnum revolver bearing serial number CSM7950;
- c. North American Arms Inc. 22 magnum pistol bearing serial number E008220;
- d. Ammunition capable of functioning in either above-identified firearm seized on April 29, 2022; and
- e. 3120 W Northwest Hwy, Dallas, Texas, and 3122 Bachman Dr., Dallas, Texas, two adjacent properties held in the name of Bartica Holdings Company further described as follows:
 - i. Being that tract of land situated in the Dickerson Parker Survey, Abstract No. 1113, City of Dallas Block 5783, Dallas County, Texas, and being part of Lots 3 & 4, Block A of Second Section of Lake Line Park, an addition to the City of Dallas, Dallas County, Texas according to the map thereof recorded in Volume 5, Page 95 of the Map Records of Dallas County, Texas, said tract also being that tract of land described in Special Warranty Deed with Vendor's Lien to Elizabeth I. Perez & Associates, Inc. recorded in Volume

95132, Page 4222 of the Deed Records of Dallas County, Texas, and being more particularly described by metes and bounds as follows:

- ii. Beginning at an "X" cut in concrete found for corner, said corner being the southwest corner of said Lot 4, Block A, said corner also being the southeast corner of Lot 5, Block A, said corner also being in the north right-of-way line of Bachman Drive (50 foot right-of-way);
- iii. Thence North 03 degrees 35 minutes 03 seconds East, along the east line of said Lot 5, Block A, a distance of 144.38 feet to an "X" found for corner, said corner being the southwest corner of that tract of land described in General Warranty Deed with Vendor's Lien to Concepcion Alvarez Ornelas recorded in Volume 97249, Page 3992 of the Deed Records of Dallas County, Texas;
- iv. Thence North 86 degrees 22 minutes 45 seconds East, along the south line of said Ornelas tract, a distance of 94.10 feet to an "X" cut in concrete found for corner;
- v. Thence North 03 degrees 24 minutes 53 seconds East, along the east line of said Ornelas tract, a distance of 158.23 feet to a 5/8 inch iron rod found for corner, said corner being in the south right-of-way line of W. Northwest Highway (100 foot right-of-way);
- vi. Thence North 86 degrees 24 minutes 46 seconds East, along the south line of said W. Northwest Highway, a distance of 20.08 feet to a 1/2 inch iron rod found for corner, said corner being the beginning of a non-tangent curve to the left, having a delta of 00 degrees 38 minutes 39 seconds, a radius of 1,955.30 feet, and a chord bearing and distance of North 85 degrees 44 minutes 47 seconds East, 21.99 feet;
- vii. Thence, in a northeasterly direction, along the south right-of-way line of said W. Northwest Highway, along said curve to the left, an arc length of 21.99 feet to a 5/8 inch iron rod found for corner, said corner being the northwest corner of that tract of land described in Warranty Deed to The John Edward Savickas 2011 Revocable Management Trust recorded in Instrument Number 202000080266 of the Official Public Records of Dallas County, Texas;
- viii. Thence South 00 degrees 01 minutes 03 seconds West, along the west line of said John Edward Savickas 2011 Revocable Management Trust tract, a distance of 179.57 feet to a PK nail found for corner;

- ix. Thence North 74 degrees 25 minutes 40 seconds East, along a south line of said John Edward Savickas 2011 Revocable Management Trust tract, a distance of 114.42 feet to a 5/8 inch iron rod found for corner;
- x. Thence South 88 degrees 19 minutes 28 seconds East, along a south line of said John Edward Savickas 2011 Revocable Management Trust tract, a distance of 34.56 feet to a PK nail found for corner, said corner being in the west line of that tract of land described in Special Warranty Deed with Vendor's Lien to Phillip Duran recorded in Instrument Number 201100000859 of the Official Public Records of Dallas County, Texas;
- xi. Thence South 07 degrees 46 minutes 29 seconds East, along the west line of said Duran tract, a distance of 87.48 feet to a 1/2 inch iron rod found for corner, said corner being in the north right-of-way line of said Bachman Drive;
- xii. Thence South 49 degrees 31 minutes 05 seconds West, along the north right-of-way line of said Bachman Drive, a distance of 24.87 feet to an "X" cut in concrete found for corner, said corner being the beginning of a
- xiii. non-tangent curve to the right, having a delta of 37 degrees 03 minutes 49 seconds, a radius of 194.07 feet, and a chord bearing and distance of South 67 degrees 42 minutes 37 seconds West, 123.36 feet;
- xiv. Thence in a southwesterly direction, along the north right-of-way line of said Bachman Drive, along said curve to the right, an arc length of 125.54 feet to a 5/8 inch iron rod found for corner;
- xv. Thence South 86 degrees 20 minutes 00 seconds West, along the north right-of-way line of said Bachman Drive, a distance of 178.18 feet back to the POINT OF BEGINNING and containing 47,325.28 square feet or 1.086 acres of land.

32. Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. § 1956(h), the defendant, **Dhanesh Ganesh**, shall forfeit to the United States of America any property, real or personal, involved in the money


laundrying conspiracy, and any property traceable to such property, including, but not limited to, the following:

- a. The property to be forfeited may take the form of a forfeiture “money” judgment; and
- b. Substitute property as allowed by 28 U.S.C. § 2461(c), 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p).

A TRUE BILL


FOREPERSON

LEIGHA SIMONTON
UNITED STATES ATTORNEY


MARY WALTERS
Assistant United States Attorney
Texas State Bar No. 24003138
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8600
Facsimile: 214-659-8802
Email: mary.walters@usdoj.go

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

DHANESH DEORAJ GANESH

SEALED INDICTMENT

26 U.S.C. § 7201

Tax Evasion
(Counts 1-5)

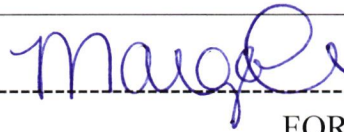
21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(C)
Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Count 6)

18 U.S.C. § 1956(h)
Conspiracy to Launder Monetary Instruments
(Count 7)

21 U.S.C. § 853(a) and 18 U.S.C. § 982(a)(1)
Forfeiture Notice

A true bill rendered

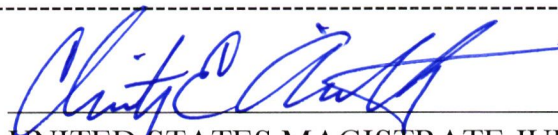
DALLAS



FOREPERSON

Filed in open court this 17 day of January, 2024.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending